BEFORE THE POSTAL RATE COMMISSION WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMIC SION OFFICE OF THE SECRETARY

EXPERIMENTAL RATE AND SERVICE CHANGES TO IMPLEMENT NEGOTIATED SERVICE AGREEMENT WITH CAPITAL ONE SERVICES, INC.

DOCKET No. MC2002-2

RESPONSE OF CAPITAL ONE SERVICES, INC. WITNESS DONALD JEAN TO INTERROGATORIES OF OFFICE OF CONSUMER ADVOCATE FILED ON OCTOBER 11, 2002 (OCA/COS-T1-17-19)

Capital One Services, Inc hereby provides the responses of witness Donald Jean to the following interrogatories of Office of Consumer Advocate: OCA/COS-T1-17-19, filed on October 11, 2002.

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted

Patton Boggs LLP 2550 M Street, NW

Washington, D.C. 20037-1350

Tel: 202 457 6050 Fax: 202 457 6315

Counsel for Capital One Services, Inc.

Dated: October 21, 2002

OCA/COS-T1-17. Please refer to your testimony at page 7, lines 1-4, where it states, "and utilize Address Correction Service information in its marketing campaigns."

- (a) Please confirm that under the NSA, Capital One will receive Change Service Requested, Option 2, at no charge for its First-Class solicitation mail. If you do not confirm, please explain.
- (b) Please confirm that under the NSA, Capital One will receive Change Service Requested, Option 2, at no charge for its First-Class customer account mail. If you do not confirm, please explain.

ANSWER

- 17(a) Confirmed. See response to OCA/COS-T1-3(a).
- 17(b) Confirmed. See response to OCA/COS-T1-3(a).

OCA/COS-T1-18. Please refer to your testimony at page 6, lines 1-9.

- (a) Please provide the percentage of Capital One's First-Class solicitation mail that was forwarded in FY 2000, FY 2001 and FY 2002.
- (b) Please provide the percentage of Capital One's First-Class customer account mail that was forwarded in FY 2000, FY 2001 and FY 2002.

ANSWER

- (a) See response to OCA/COS-T1-9(c).
- (b) See response to OCA/COS-T1-9(c).

- OCA/COS-T1-19. Please refer to your testimony at page 6, lines 21-22, and page 7, lines 1-4.
- (a) Assuming the NSA is implemented, please estimate the percentage of physical returns of Capital One's First-Class solicitation mail in FY 2004 and FY 2005, the second and third years of the agreement, respectively.
- (b) Assuming the NSA is implemented, please estimate the percentage of physical returns of Capital One's First-Class customer account mail in FY 2003, FY 2004 and FY 2005, the three-year period of the agreement.
- (c) Assuming the NSA is implemented, please estimate the percentage of Capital One's First-Class solicitation mail that will be forwarded in FY 2003, FY 2004 and FY 2005, the three-year period of the agreement.
- (d) Assuming the NSA is implemented, please estimate the percentage of Capital One's First-Class customer account mail that will be forwarded in FY 2003, FY 2004 and FY 2005, the three-year period of the agreement.

ANSWER

- (a) As indicated in our response to OCA/COS-T1-11(b) and (c), the Company does not forecast return mail rates.
- (b) See (a) above.
- (c) See response to OCA/COS-T1-9(c).
- (d) See response to OCA/COS-T1-9(c).

DECLARATION

I, Donald Jean, declare under penalty of perjury that the foregoing answers are true and correct to the best of my knowledge, information and belief.

(Signed)

October _______, 2002

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with Rule 12 of the rules of practice.

Fimothy J. May

Dated: October 21, 2002